

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT  
OF MISSOURI

FILED  
FEB 12 2015  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

Jury Trial Demand

4:15CV000288 RWS

WILLIE WATSON

)

Case

)

)

Vs

MEMORANDUM TO THE CLERK

1 St. Louis County Police Department  
Employees political Subdivision State  
Of Missouri

2 COLLECTOR OF REVENUE  
Political Subdivision State of Missouri  
Defendant-1

3 USAA GARRISON INSURANCE COMPANY  
A Texas Insurance Company DOB in Missouri  
Defendant-2

4 Jane And John Doe *individual s*  
Concealed by Political Subdivision

5 State of Missouri  
Defendant-3

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COLLECTOR OF REVENUE

Political Subdivision State of Missouri

Defendant-1

USAA GARRISON INSURANCE COMPANY

A Texas Insurance Company DOB in Missouri

Defendant-2

Jane And John Doe *individual s*

Concealed by Political Subdivision

State of Missouri

Defendant-3

(1)

HSBC MOTOR CREDIT

A California Credit Company DOB

In Missouri Defendant-4

Serve:

PATRICIA REDINGTON  
St. Louis County Counselor  
County Government Center  
4: South Central 9th Floor  
ST. LOUIS COUNTY MO. 63105

**COMPLAINT FOR:**

1. Breach of the Peace
2. Breach of Contract
3. Conversion
4. Declaratory Relief
5. Breach of Fiduciary Duty

**Plaintiff Pro se Willie Watson alleges** against Defendants St. Louis County Police Department

COLLECTOR OF REVENUE, USAA GARRISON INSURANCE COMPANY, Jane And John Doe and

HSBC MOTOR CREDIT, (collectively, "Defendants"), and each of them, as follows:

**GENERAL ALLEGATIONS**

1. At all relevant times, Plaintiff Willie Watson has been and is an individual residing in St. Louis County Missouri.
2. Plaintiff is informed and believes and thereon alleges that at all relevant times

Defendant St. Louis County Police Chief Tim Fitch, has been and is an individual residing in .  
St. Louis County Missouri.

3. Plaintiff is informed and believes and thereon alleges that at all relevant times Defendants St. Louis County Police Department . has been and is a Police Department employed by Political Subdivision State of Missouri
- 4.

principal place of business in Clayton Missouri,

Defendant COLLECTOR OF REVENUE, Political Subdivision of the united Government, State of Missouri duly organized and existing under the laws of the State of Missouri with its principal place of business in Clayton Missouri

5. Plaintiff does not know the true names of Defendants DOES 1 through 2, inclusive,
6. and therefore sues them by those fictitious names. Plaintiff is informed and believes and thereon alleges that each of these Doe Defendants was in some manner responsible for the events and happenings alleged in this Complaint and for Plaintiffs injuries and damages Plaintiff is informed and believes and thereon alleges that at all times herein mentioned
7. each of the Defendants herein were the agents and/or co-conspirators with each of the remaining Defendants, and in acting or omitting to act as alleged were acting or omitting to act within the scope of such agency and/or conspiracy with the knowledge, permission, consent and/or approval of all Defendants, and each of them.

#### FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

##### Salient Facts about the St. Louis County Police Department and Defendants

On 12/12/12/ at 12am the St. Louis County Police car numbers 3104 and 2993 were dispatched on a trespassing and AGGREGATED

Assault call, by Plaintiff VIA 911 operators, this is documented on the St. Louis County (CAD) system. Location 10108 Castle St. Louis Missouri, Victim Home owner Willie Watson, the violators identity and legal business was concealed by St. Louis County Police, Officer Bob Marley, failed duty to provide a required official police report, the St. Louis County Police wrongful actions assisting the commission of crimes is a case of the Law breaking the Law. And it created a constructive conspiracy conflict of interest, to cover-up

the crimes committed by the (Does ) enjoined by St Louis County Department of Revenue with a breach of the peace to collect on a fraudulent claim involving unfounded allegation of taxes while using

the power and support of Political Subdivision of the United States Government State of Missouri, whereas Defendants Attorneys played a two year game of hide the ball with the full support of the trial court Judges in concert with the Appellate courts as evidence of record exhibits confirms at : (13-SL-AC18152,13-SL-AC38845, 4:13-CV-00782RWS and 13-2567).

The 911 tapes will validate that a physical confrontation was in process and that the Does were the perpetrators of the Aggravated Assault and Trespassing on plaintiff's property at 12AM on 12/12/12/, without legal reason, Order or Order of the Court.

The facts of the matter are that, Trial judges are not legal authority! Appellate courts are!

The U.S. Constitution is not controlling law. What appellate courts say the U.S. Constitution means is controlling law.

Statutes are not controlling law. What appellate courts say statutes mean is controlling law. The courts in this instance case are saying case closed no actions will be taken. The trial court by way of the county Counsel Paul Becker ,is stating that because, since the Does who were trespassing and assaulting Willie Watson in his driveway did not want to file charges , no report will be written.

Trespassing and Aggravated Assault are crimes that are non discretionary relative to file a police report, law enforcement Department policy demands that a report be written and made available for insurance purpose. Since Willie Watson has been victimized in 2012, the St. Louis County Police Department has not provided him with a Police Report, has not found and returned his 2005 Chevy to his possession, has not produced any legal reasons orders of the court or protected interest for authorizing and assisting the removal of On information and belief, the decisions not to write a police report were made by Officer Bob Marley of the St. Louis County Police Department. Plaintiff is informed and believes and thereon alleges that at all relevant times Defendants and the courts are in concert ,with the full understanding that as long as the St. Louis County Police Department is allowed to investigate its self, by the Government that it is employed by ,it can hide any crimes that it wishes to commit

**Trespass, 1st degree**

"A person commits the crime of trespass in the first degree if he knowingly enters unlawfully or knowingly remains unlawfully in a building or inhabitable structure or upon real property."

Trespass in the first degree is a **class B misdemeanor** in Missouri.

**Trespass, 2nd degree**

"A person commits the offense of trespass in the second degree if he enters unlawfully upon real property of another..."

Trespass in the second degree is an **infraction** in the state of Missouri.

**Aggravated assault**

A person has committed an aggravated assault when that person attempts to:

cause serious bodily injury to another person with a deadly weapon <sup>[6]</sup>

cause grievous bodily harm to another person, such as rape or kidnapping

have sexual relations with a person who is under the age of consent

**Aggravated assault can also be charged in cases of attempted harm against police officers or other public servants, or for bodily harm stemming from the reckless operation of a motor vehicle. The latter is often referred to as either **vehicular assault** or **aggravated assault with a motor vehicle**.**

A. 2005 Chevy Vehicle (VIN) was involved in this instance case.

**B. The Fraudulent Amended and Restated**

COLLECTOR OF REVENUE is claiming credit and liability, without justification AND REQUIRED Police report for the assault and trespassing that occurred 12/12/12 where claimant's 2005 Chevy was unlawfully removed from the drive way of his home located at 10108 Castle St. Louis Missouri, by John DOES, and are still missing without justification, order or order of the court

Or any written documentation made available to the undersigned as to any one other than COLLECTOR OF REVENUE, having an interest. The courts are on record supporting and shielding the conspiracy

**2005 Missouri Revised Statutes - § 516.120. — What actions within five years.**

516.120. Within five years:

- (1) All actions upon contracts, obligations or liabilities, express or implied, except those mentioned in section 516.110, and except upon judgments or decrees of a court of record, and except where a different time is herein limited;
- (2) An action upon a liability created by a statute other than a penalty or forfeiture;
- (3) An action for trespass on real estate;
- (4) An action for taking, detaining or injuring any goods or chattels, including actions for the recovery of specific personal property, or for any other injury to the person or rights of another, not arising on contract and not herein otherwise enumerated;
- (5) An action for relief on the ground of fraud, the cause of action in such case to be deemed not to have accrued until the discovery by the aggrieved party, at any time within ten years, of the facts constituting the fraud.

**C. Acts Leading to the Creation of the Fraudulent Memorandum of Understanding**



On May 22, 2014 by case 13SL-AC38845 Judge Judy Preddy Draper Dismissed the COLLECTOR'S charges against defendant for alleged infraction stated taxes 2010, 2011, 2012, On 12/03/2015 the Collector adjusted plaintiff's tax obligation and 2014 tax bill to total the unfounded amount of the alleged billing aforementioned as displayed herein by exhibits

FIRST CAUSE OF ACTION

(Breach of Contract Against)

USAA GARRISON INSURANCE COMPANY

A Texas Insurance Company DOB in Missouri, Plaintiff incorporates by reference and re-alleges paragraphs 1- 5 ("Agreement") attached hereto as Exhibit A and

incorporated herein by reference is a binding legal instrument that creates mandatory obligations on the

part of USAA GARRISON INSURANCE COMPANY

A Texas Insurance Company DOB in Missouri favor of Willie Watson

USAA GARRISON INSURANCE COMPANY breached their contractual obligations to Willie Watson by failing to issue him Payment for his losses evidencing his ownership in his 2005 Chevy Uplander as required by contract agreement

USAA GARRISON INSURANCE COMPANY breached their contractual obligations to Willie Watson

purporting to ownership interest. USAA GARRISON INSURANCE COMPANY breached their contractual obligations to by

converting plaintiff's interest in to their own use and benefit without approval, knowledge or consent, and to his detriment. And canceling his paid premiums as a fraud claim

without proof by documentation of an official Police report validation.



SECOND CAUSE OF ACTION

(Conversion Against) HSBC MOTOR CREDIT and COLLECTOR OF REVENUE St. Louis County Mo.

Plaintiff incorporates by reference and re-alleges paragraphs 1 through 5 herein as if

4 fully set forth.

5 Pursuant to the Agreement Willie and Bessie Watson has clear legal ownership and right to possession

6 Missouri UCC and Title

Defendants wrongfully

7 misappropriated Plaintiff s ownership for their own benefit and to

8 Plaintiffs detriment, in violation of Plaintiff s property rights.

As a proximate result of Defendants' acts of conversion, Plaintiff has been deprived of

9 his property rights and suffered damages in excess of \$ 100.000, in an amount to be proved at trial.

10 The aforementioned acts of Defendants were willful, wanton, malicious, and oppressive,

11 were undertaken with the intent to defraud, and justify the awarding of exemplary  
and punitive

12 damages.

THIRD CAUSE OF ACTION

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(Breach of Fiduciary Duty) Against Political Subdivision of the  
United States Government State of Missouri

State of Missouri is a Political Subdivision of the United States Government

13 the State of Missouri was at all times alleged herein the majority  
owner of Litigation Process

14 and controlled all aspects of redress

15 . As a majority party in trial court the State of Missouri owed a  
fiduciary duty to minority

16 to act at all times with the utmost care, honesty, undivided loyalty and fidelity in

17 all legal business dealings with the Watson in this instance case.

18 . The State of Missouri breached its fiduciary duty to Plaintiff Watson  
19 by the acts of misfeasance

and malfeasance

20 described herein, including but not limited to those acts of self-dealing that were  
designed

21 to deprive the watson's of their ownership rights in the taking of the 2005 Chevy  
Uplander and the fraudulent transfer of

22 ownership rights to HSBC MOTOR CREDIT and/or others,

23 . As a proximate result of THE State of Missouri breach of fiduciary  
duty, the Watson has been

24 harmed as alleged herein in an amount in excess of \$100.000, in an amount to be  
proved at trial

FOURTH CAUSE OF ACTION

Fraud

Against All Defendants

Plaintiff incorporates by reference and re-alleges paragraphs 1 through5 herein as if

IT fully set forth.

12 . Defendants Bob Marley , ST. Louis county police department HSBC  
MOTOR CREDIT and John DOES have suppressed and concealed

13 certain material facts which they had a duty to disclose to Plaintiff.

14 . In particular, Defendants knew and concealed from Watson the  
following material

15 facts:

16 a. County Police Department caused a fraudulent "conflict of  
interest '

17 " to be created that purportedly divested Watson of his  
18 ownership interest and rights to personal property;

19 b. St. Louis County Police Department purportedly failed or  
refused to write a required police report ;

20 b. Department of Revenue St Louis County purportedly enjoined

the conspiracy by conflict of interest created by the St. Louis  
County Police Department  
21 surreptitiously did so with John Does purportedly authorized,  
and assisted John Does then concealed their identity

#### FIFTH CAUSE OF ACTION

1 (Declaratory Relief Against All Defendants)

2 Plaintiff incorporates by reference and re-alleges paragraphs 1  
through 5 herein as if

3 fully set forth.

4 An actual controversy has arisen and now exists between Plaintiff and  
Defendants

5 concerning their respective rights and duties, in that Plaintiff contends as follows: (a)  
that he is the

6 owner of 2005 Chevy Up lander; (b) that he has the vested right to possession.

7 John DOES and the St. Louis County Police Department by Officer Bob Marley took  
possession

From the driveway of Plaintiff home located at 10108 Castle On 12/12/12 at 12AM without legal reason, notice or validation of proof ,and have concealed the location and where about, then failed or refused to make a written report available to plaintiff

8 ownership of HIS 2005 Chevy Up lander from 2012 to present which have been wrongfully withheld from him;

9including but not limited to defendant St. Louis County Department of Revenue .Despite their allegation of tax claims.

RAYER:

1 WHEREFORE, Plaintiff prays for judgment against all Defendants as follows:

2 A. FIRST CAUSE OF ACTION (Breach of Contract)

- 3 1. For compensatory damages, in the amount in excess of \$100,000 to be proved  
4 at trial; and

5  
6 B. SECOND CAUSE OF ACTION (Conversion)

- 7 1. For compensatory damages, in an amount in excess of \$100,000 in an amount  
8 to be proved at trial;

2. For prejudgment interest at the highest legal rate from the date of the  
conversion; and

3. For the return of the 2005 Chevy Uplander owned by Plaintiff and the right to exercise the  
vested options.

C. THIRD CAUSE OF ACTION (Breach of Fiduciary Duty)

1. For compensatory damages, in an amount in excess of \$100,000 in an amount  
to be proved at trial; and

2. For interest at the highest legal rate from the date of the breach of fiduciary  
duties.

D. FOURTH CAUSE OF ACTION (Fraud)

1. For compensatory damages, in the amount in excess of \$100,000 to be proved  
at trial;

2. For any and all special, incidental and/or consequential damages, according to  
proof; and

3. For exemplary and/or punitive damages.

E. FIFTH CAUSE OF ACTION (Declaratory Relief)

1. For a declaration that Plaintiff owns the 2005 Chevy Uplander

2. For a declaration that Plaintiff has a vested right to possession of  
his 2005 Chevy Uplander.

3. For a declaration that John DOES and HSBC MOTOR CREDIT had no authority to  
Possession

or any third party, and that all such purported claims

are nullities;

4.



**Certificate of Service**

**I certify that the foregoing documents were filed with the court this date 2/11/2015, and sent to the following by way of regular U.S. Mail:**

**Colonel: Tim Fitch  
7900 Forsyth BLVD  
Clayton Missouri 63105**

**Chris Kosher  
State of Missouri  
Old Post Office building  
815 Olive Suites 200  
St. Louis Mo. 63105**

**Stuart Blain Parke  
USAA Garrison insurance Company  
9800 FREDERICKBURG ROAD  
SAN ANTONIO, TEXAS 78288**

**U.S. Attorney Richard Callahan**  
**Thomas Eagleton U.S. Courthouse**  
**111 S. 10th Street, 20th Floor**  
**St. Louis, MO 63102**

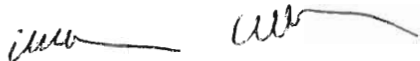
**NAKEYIA SHERMAINE WILLIAMS**  
**St. Louis County Counselor's**  
**41 S. Central Ave. 9th FL**  
**Clayton, MO. 63105**

**Respectfully submitted this 11<sup>th</sup> day of February, 2015**

  
**WILLIE WATSON**

**10108 Castle**  
**St. Louis Missouri 63136**

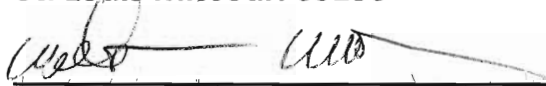
Respectfully submitted this 11<sup>th</sup> day of February, 2015



**WILLIE WATSON**

**10108 Castle**

**St. Louis Missouri 63136**

 **Appellant**

**STATE OF MISSOURI COUNTY OF ST. LOUIS Before the undersigned authority  
this day personally appeared PLAINTIFF being first duly sworn on oath,**

**Says the foregoing is just and true statement, exclusive of all set Offs and just  
grounds of defense.**

**Sworn to and subscribed to before me this 11 day of February,**  
**20 15**

**Notary Public**



**My Commission expires** OCT 12, 2015

